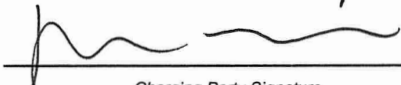


EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b> This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
<b>Wisconsin Department of Workforce Development's Equal Rights Division</b> and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) <b>Ms. Hannah Priddy</b>		Home Phone (Incl. Area Code) <b>(414) 840-6407</b>	Date of Birth <b>3/30/1995</b>
Street Address <b>W2459 Woodland Rd.</b>		City, State and ZIP Code <b>Iron Ridge WI 53035</b>	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name <b>Dr. Noah's Ark Veterinary Clinic</b>		No. Employees, Members <b>30-plus</b>	Phone No. (Include Area Code) <b>(414) 231-3333</b>
Street Address <b>4604 N. Wilson Drive</b>		City, State and ZIP Code <b>Shorewood, WI 53211</b>	
Name <b>Dr. Noah Arnold</b>		No. Employees, Members	Phone No. (Include Area Code)
Street Address <b>9600 N. Lake Dr.</b>		City, State and ZIP Code <b>Bayside, WI 5321</b>	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest <b>2/1/2017</b> Latest <b>3/29/2021</b> <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I was hired by Dr. Noah's Ark, a veterinary clinic, as a Receptionist on February 1, 2017. From the beginning, Dr. Noah Arnold, the owner of the clinic, made me uncomfortable. Early into my tenure, he began to have an affair with Emily, the Office Manager. Subsequently, Dr. Arnold terminated Emily because his wife had found out about this affair. After this, Dr. Arnold embarked in an affair with an employee by the name of Desi, and had me lie and cover up for him with his wife, which made me extremely uncomfortable. I saw Dr. Arnold and Desi engage in sexual conduct in examination rooms in the clinic and after work outings. Dr. Arnold often used my cellphone to text Desi, so his wife would not find out. Even when I refused to give him my cellphone, Dr. Arnold would try to find ways to get a hold of it when it was left unattended, or would hack into it and was able to figure out my password a few times. Dr. Arnold would also get into my social media accounts on my cellphone, so he could access accounts of female coworkers who had blocked him, and read my personal text messages. Desi was soon given more important assignments at the clinic, along with a pay raise. I felt I was at a disadvantage because I was not romantically involved with Dr. Arnold.</p> <p>On one occasion, Dr. Noah invited his staff to Sundara's Resort. When we got there, we realized he had only gotten one condo suite, which included an in-room jacuzzi, and that he had brought alcohol and drugs for us.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
11.9.21 Date		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
 Charging Party Signature			

**CHARGE OF DISCRIMINATION**

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Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA  
☒ EEOC

**Wisconsin Department of Workforce Development's Equal Rights Division** and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Dr. Arnold encouraged us all to participate in group massages and using the in-room jacuzzi. Dr. Arnold, his wife, and Desi were all inebriated, and Dr. Arnold was using drugs throughout, which made the entire situation uncomfortable for me, because Dr. Arnold and Desi tried to sneak out on their own, and he expected me to cover for him with his wife. During this outing, Dr. Noah also made lewd comments about how my body looked in a swimsuit. As had been the case with Emily, Dr. Arnold terminated Desi after his wife pressured him to. However, Dr. Arnold continued to have an affair with Desi, and talked in detail about this at the clinic, which made his employees very uncomfortable.

While at the clinic, Dr. Arnold constantly talked about his sex life in detail, as well as about his fights with his wife, his drug use, and other claims of sexual harassment that had been filed against him. I hated this and had never once consented to any of this. One of the things Dr. Arnold discussed was his affair with his best friend Phil's wife. Specifically, Dr. Arnold would tell me about how he, Phil, and Phil's wife would get so high on valium that they would black out at Phil's house on their bed and how, while Phil was still unconscious, he and Phil's wife would have sex right next to him. Dr. Arnold would describe in detail how Phil's wife would give him oral sex and then laugh while saying that "her face isn't that good but her body's okay". Dr. Arnold would also show me and other coworkers sexually explicit photographs of Phil's wife that she would send him during the work day. Dr. Arnold later hired Phil as the clinic's Human Resources Manager, which made it very awkward for me to come forward and complain to him.

Dr. Arnold then moved on to an affair with a woman by the name of Maribelle, with whom I had gone to high school. Once he found out I had gone to high school with Maribelle, he would get me involved in situations I did not want to be in, including accompanying him to Maribelle's house, after which Dr. Arnold would describe in graphic detail his sexual activity with Maribelle show me the graphic sexual photos she would send him.

The Office Manager was Dr. Arnold's mother, who was fully aware of her son's conduct. One afternoon, as I was walking into her office, Dr. Arnold was walking out, and he grabbed my face, pulled it towards him, kissed me on the mouth, laughed in my face, and walked away. I was so shocked and humiliated I later confided in another doctor and a coworker because I was scared of him and scared I might lose my job. I was also afraid his wife would find out and pressure him to fire me. I once saw a message his wife had sent him, telling him she wanted me dead, because I had covered up for him to her when he had affairs. This mad me fear for my safety. Later, when Dr. Arnold learned I was upset, he told me that he had kissed me on the mouth because he supposedly loved me like a sister. This explanation made me even more disgusted. I was afraid of coming forward to the Office Manager about this conduct, because she was his mother, and I knew she had downplayed prior complaints from other employees.

There were numerous occasions during the workday where Dr. Arnold would ask me very detailed questions about my sex life and what things sexually I had tried or wanted to try with past boyfriends and or my fiancé. He would also tell me that I should never think about getting married because marriage ruins peoples' lives. He would ask me to do housecalls with him, during which he would often ride shirtless and consume drugs. During some of these housecalls, I would have to stay in the car while he visited a mistress or went to his house to argue with his wife. During one of these visits to his house, Dr. Arnold got into a physical altercation which resulted in him getting gravely wounded. Dr. Arnold drove back to the clinic, in an extremely weakened state because of his wound, and sutured it himself.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

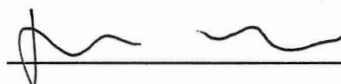
NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.  
 SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
 (month, day, year)

11.9.21

Date



Charging Party Signature



## CHARGE OF DISCRIMINATION

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### Wisconsin Department of Workforce Development's Equal Rights Division and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

This incident traumatized me. He asked me to cover up this incident, but when his mother found out, she was upset at me, which made me fear for my job. I eventually had to care for Dr. Arnold's wound when it became infected, as he was not welcome back at his own home.

Dr. Arnold continued to talk about bizarre and inappropriate things. He told me that, when he was a child, he often caught his dad masturbating and watching pornographic movies. On multiple occasions he also described to me and other employees how, when he would go home, he and his oldest daughter Sadie had a special nighttime ritual in which she would rub herself between her legs while he played guitar next to her bed. He joked that she would definitely need therapy someday and that she might not be able to climax as a sexually active adult without hearing her father's voice. It got to the point where another coworker had to ask Noah to stop talking about Sadie like that because it made us all so uncomfortable. Dr. Arnold also talked about his son masturbating in public, including once while getting a haircut. I found these conversations unspeakably disturbing.

Towards the end of my employment, Dr. Arnold opened a new clinic called "Sanctuary", and hired a new technician by the name of Rachel, with whom he almost immediately began to have an affair. On at least one occasion, I and other employees caught them in bed, in an upstairs bedroom at this clinic. We were instructed to always knock on the bedroom door, but when we opened the door, they would not even bother getting out of bed. Dr. Arnold tasked me and other employees with decorating and painting the new clinic. On one occasion where I was painting, told me that my "ass looked like a black girl's ass", and said that we should be inappropriate with each other, so that he had something to "blackmail" us with. Dr. Arnold often asked for constant reassurance that none of us would sue him in the future, knowing that he was well over the line constantly at this point.

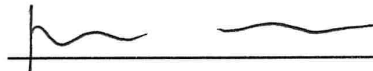
On March 20, 2021, Dr. Arnold texted me saying "call me back". I messaged him back, saying I was with my family and asked what he needed. He replied that he wanted to discuss work-related things on the weekend. Throughout my employment with the clinic, he manipulated me into calling him back in this situation, only to have him talk about non-work-related matters. I replied via text and told him exactly what was accomplished that afternoon at the clinic, and said that I was not able to speak on the phone either that day or the next because my family from out of town was there. Once Dr. Arnold realized I was no longer engaging with him, he told me to take the day off on Monday and that we would speak Tuesday. I did what he told me to do and did not go to work on Monday. However, on Monday morning, I received a text from him saying "I need you more than ever and you won't even reply to me. I don't know what to think might be going on, but this is not the Hannah I'm used to", and then "please don't come back to work until you call me. This is not paid leave (you're also welcome to call Phil or Ben or my mom)". This was extremely confusing to me, as he had told me not to work on that day. When we finally talked, Dr. Arnold and I discussed his supposed concerns about me not minding him anymore and my questions about him wrongfully terminating my fellow coworker Garrett. During this conversation, Dr. Arnold divulged personal information about Garrett and lied about why he fired Garrett. I told Dr. Arnold that his rationale for terminating Garrett was wrong, and he terminated me on March 29, 2021. Ben, the Human Resources Manager, told me that the rationale was "job abandonment", which I knew to be untrue.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

11.9.21

Date



Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

## CHARGE OF DISCRIMINATION

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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

My employment with Dr. Noah's Ark was fraught with a constant series of inappropriate interactions and incidents that made me fear for my job and my own personal safety. Specifically, Dr. Arnold habitually engaged in conversations which I found appalling and disgusting, including explicit and graphic descriptions of sexual intercourse, and comments about my body. Because Dr. Arnold is the owner of the clinic, the Office Manager is his mother, and the Human Resources Manager is a friend with whose wife Dr. Arnold had an affair, I felt trapped and thought that nobody at the clinic could help me. Also, Dr. Arnold asked, and expected, me to cover up his marital infidelity and drug use, which made me fear for retaliation from his wife, who I knew had pressured him into terminating other employees, and who explicitly said she wanted me to die.

Sexual harassment is a form of sex discrimination that violates Title VII of the Civil Rights Act of 1964. Unwelcome sexual advances and other verbal or physical conduct of a sexual nature constitute sexual harassment to the extent it affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Dr. Arnold's inappropriate conduct was a pattern of unlawful conduct so incessant and pervasive that, both while I was employed by him and afterwards, I have had trouble sleeping and felt under constant stress and anxiety, to the point I have had to seek professional help to manage this stress and anxiety.

As a direct and proximate cause of Noah's Ark's actions, I have suffered damages, including, but not limited to, emotional distress and physical harm, mental anguish, loss of reputation, loss of past wages, loss of future wages, loss of benefits, attorneys' fees, costs, and other expenses as allowed by law. Noah's Ark's reckless indifference as to my rights, including its pattern of harassment, discrimination, and retaliation, as well as its failure or refusal to investigate my internal complaint, entitles me to punitive damages.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

11.9.21

Date



Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)



**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

#### **NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW**

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

#### **NOTICE OF NON-RETALIATION REQUIREMENTS**

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.